

# Agenda

## Item #6



STATE OF MAINE  
COMMISSION ON GOVERNMENTAL ETHICS  
AND ELECTION PRACTICES  
135 STATE HOUSE STATION  
AUGUSTA, MAINE  
04333-0135

To: Commissioners

From: Jonathan Wayne, Executive Director  
Benjamin Dyer, Political Committee and Lobbyist Registrar

Date: July 23, 2014

Re: Request for Waiver of Late-Filing Penalty by Alfond Business, Community & Democracy PAC

All political action committees are required to file campaign finance reports by the deadlines set in statute. Beyond simply filing the report by the deadline, a timely-filed campaign finance report must substantially conform to the disclosure requirements of Maine Election Law. This includes accurately reporting contributions and expenditures received during the reporting period. The Alfond Business, Community & Democracy PAC filed its 2013 October Quarterly and 2014 January Quarterly reports by the deadlines, but these reports did not include several substantial contributions and expenditures.

#### **LEGAL REQUIREMENTS**

PACs are required to file campaign finance reports according to a schedule set by statute. (21-A M.R.S.A. §1059(2)) The 2013 October Quarterly report was due on October 7, 2013. The 2014 January Quarterly report was due on January 15, 2014. A campaign finance report is not timely filed unless it substantially conforms to the disclosure requirements of Chapter 13, Subchapter 4. (21-A M.R.S.A. §1062-A(2)) If a PAC is

late in filing a campaign finance report, the amount of the preliminary penalty is set by a formula which takes into consideration the amount of the transaction, the number of prior violations within a two-year period, and the number of days the report is late. (21-A M.R.S.A. § 1062-A(3)) PACs may request a full or partial waiver of the penalty. Maximum penalties for PACs are \$10,000, except if the financial activity reported late exceeds \$50,000, the maximum penalty is 1/5 of the amount reported late. (21-A M.R.S.A. §1062-A(4))

## **DISCUSSION**

Senator Justin Alfond is the Principal Officer of the Alfond Business, Community & Democracy PAC (the PAC). Until the PAC re-registered in the spring of 2014<sup>1</sup>, he was also the PAC's treasurer. On Thursday, July 17, 2014, Sen. Alfond contacted the Commission staff. He said that he discovered that his PAC had made some reporting errors, and that he wanted to bring this forward to the staff and discuss how to correct the errors. Commission staff met with Sen. Alfond on July 18, 2014. At that time, he provided a detailed summary of the reporting errors he discovered upon review of his PAC's bank records and campaign finance report filings.

During the 2013 October Quarterly reporting period, the PAC received a total of \$6,000 in contributions from six donors that it did not report. During that same time period, the PAC made a \$6,500 expenditure in the form of a contribution to the Maine Democratic Party (MDP) that the PAC did not report. During the 2014 January Quarterly reporting

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<sup>1</sup> With the 2014 biennial re-registration, PACs are now required to have at least a principal officer and a treasurer. These positions cannot be filled by the same person.

period, the PAC did not report a \$49 cash deposit or a total of \$400 it received in checks from four donors. The PAC also did not report an \$18,000 expenditure in the form of a contribution to the MDP or \$19.75 in fees paid to ActBlue.<sup>2</sup>

Based on the statutory formula for calculating late-filed report penalties, the preliminary penalty amounts equal the statutory maximums, calculated as follows:

<b>Filing</b>	<b>Due Date</b>	<b>Financial Activity</b>	<b>Penalty Rate</b>	<b>Days Late</b>	<b>Calculated Penalty</b>	<b>Statutory Maximum Preliminary Penalty</b>
2013 October Quarterly Report	10/17/2013	\$108,822.11	1%	283	\$307,966.26	\$21,764.42
2014 January Quarterly Report	1/15/2014	\$39,239.00	3%	184	\$216,599.28	\$10,000.00

In its request for a waiver, the PAC accepts full responsibility for the filing errors, but asks that the Commission significantly reduce the preliminary penalty because the penalty is disproportionate to the harm suffered by the public. The PAC notes that the expenditures in the form of contributions to the MDP were reported by the party in the appropriate reports, minimizing the harm to the public. Also, it argues that the public interest in the disclosure of these kinds of expenditures – contributions to another organization – is less than that for independent expenditures or expenditures during a 24-hour reporting period. Regarding the unreported contributions received, the PAC

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<sup>2</sup> The PAC also disclosed additional, minor errors: a contribution reported but not actually received in the 2013 October Quarterly and a contribution reported as received for which the check failed to clear and the associated bank fee in the 2014 April Quarterly reporting period. While these errors should be corrected, the Commission staff does not consider these errors a substantial reporting issue.

believes the errors resulted from an internal reporting system which, it acknowledges, improperly used the date a check was written as the date it was received for reporting purposes, leading to several oversights in reporting when the date written on a check and the date the PAC deposited it overlapped two reporting periods. After discussions with Commission staff, the PAC writes that it is now reporting using the date a check is received.<sup>3</sup>

### **STAFF RECOMMENDATION**

The timely filing of accurate campaign finance reports is the bedrock of Maine's campaign finance disclosure system. Violations of these reporting requirements can be serious because the public is denied information it needs to determine who is financing campaign activity in Maine and the connections among entities that money creates. In this case, nearly \$6,500 in contributions and over \$24,500 in expenditures were not reported as required by statute. Additionally, this PAC is a sophisticated actor in the Maine political process, and should have the controls in place to prevent these kinds of oversights from occurring.

However, this case also contains several mitigating factors which suggest that a reduction in the preliminary penalty would be appropriate. First, on the expenditure side, although the PAC did not report \$24,500 in expenditures, the receiving party in both instances, the MDP, did timely report the receipt of these contributions. Thus, the harm to the public was minimal because the public was provided in a timely manner the information about

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<sup>3</sup> This new system would be compliant with Commission Rules Chapter 1, Section 6, which requires that the date of a contribution is "the date it is received by . . . a political action committee and its agents."

who made these contributions and when they were received. Second, on the contribution side, although the PAC did not report the receipt of nearly \$6,500 in contributions, they constituted a relatively small amount of the nearly \$135,000 raised in contributions during the two reporting periods at issue. Additionally, since these reports covered a portion of an off-election year, the harm to the public in not knowing how money was changing hands to influence elections is less significant. Also, it was the PAC which brought these errors to the attention of the Commission staff, accepted responsibility for the reporting errors, took steps to prevent this situation from happening in the future, and made the corrections necessary to provide the proper disclosure. Finally, the PAC has no previous violation. Weighing the aggravating and mitigating factors, the staff recommends that the Commission find that, because the reports were substantially out of compliance with reporting requirements, the PAC failed to timely file two campaign finance reports and impose a fine of \$1,000 for the late 2013 October Quarterly report and \$500 for the late 2014 January Quarterly report.

Thank you for your consideration of this memo.

## **BERNSTEIN SHUR**

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July 23, 2014

Jonathan Wayne  
Executive Director  
Maine Commission on Governmental Ethics and Election Practices  
135 State House Station  
Augusta, ME 04333-0135

**RE: Alfond Business, Community & Democracy PAC – Penalty Waiver Request**

Dear Mr. Wayne:

On behalf of my client, the Alfond Business, Community & Democracy PAC (ABCD PAC or PAC), and pursuant to 21-A M.R.S.A. § 1062-A(5), I write to request a waiver of the preliminary penalties issued by the Commission staff for incomplete/late filing of the 2013 October Quarterly Report and the 2014 January Quarterly Report. While the ABCD PAC takes full responsibility for the filing errors, the mistakes outlined below were inadvertent and the result of personal circumstances which led to inadequate record keeping. The ultimate harm to the public was minimal and the ABCD PAC self-reported to the Commission staff as soon as the errors were discovered.

### **FACTUAL SUMMARY**

In early July 2014, the PAC went to check its bank balance but was unable to find a current bank statement. It then pulled up its April 2014 Quarterly Report but realized immediately that the balance in that report seemed too high. The next day, the PAC requested copies of all check images and bank statements from July 2013 to present. For the next several weeks, the PAC worked to reconcile those statements and recognized several omissions and needed amendments to the ABCD PAC reports.

Upon realizing these issues, the PAC immediately contacted the Ethics Commission staff and asked to meet in order to review the needed amendments. On July 18, 2014, a representative of the ABCD PAC met with Paul Lavin and Ben Dyer to lay out all the factual information and outline the needed amendments to the reports.

On July 21, 2014, the PAC received preliminary determination letters for its October 2013 Quarterly Report and its January 2014 Quarterly Reports. It is from these determinations that the PAC now requests a substantial waiver of the fines.

### REPORT ERRORS

The internal audit of the ABCD PAC revealed the following five categories of errors:

1) *Expenditures Inadvertently Omitted From Reports*

On two occasions, the PAC made contributions to the Maine Democratic Party which were then inadvertently left off quarterly reports. First, on July 31, 2013, the ABCD PAC wrote a check for \$6,500 to the Maine Democratic Party. The contribution was properly reported on the Maine Democratic Party's quarterly report but was inadvertently omitted on the ABCD PAC's quarterly report. Second, on October 4, 2013 the ABCD PAC wrote a check for \$18,000 to the Maine Democratic Party. Again, the contribution was properly reported on the Maine Democratic Party's quarterly report but was inadvertently omitted on the ABCD PAC's quarterly report.

While there is no question the contributions should have been listed on the ABCD PAC's quarterly report, harm to the public was reduced by several factors. First, the contributions did appear in a timely manner on the Maine Democratic Party's quarterly report giving the public notice that the transactions had taken place. Second, the expenditures were not specifically related to any particular race or campaign. The PAC did not, for example, make an independent expenditure or give a contribution in the period which would have required a 24-hour report. While the ABCD PAC takes responsibility for the error, it argues that the proposed penalty is hugely disproportionate to the actual harm suffered by the public for these two omissions.

2) *Contributions Inadvertently Omitted From Reports*

On August 22, 2013, the ABCD PAC deposited a series of checks including a check for \$1,500. When the October quarterly report was filed, the check was inadvertently omitted from the listing of contributors. On November 5, 2013, the PAC made a large deposit of checks as well as a small deposit of \$49 in cash. The cash deposit of \$49 was inadvertently omitted from the January report.

Again, while the PAC takes full responsibility for the lapse – it argues that the proposed penalty is grossly unfair as related to the minimal public harm.



3) *Report Not Properly Amended*

On September 3, 2013, the ABCD PAC received a check in the amount of \$100. While that check was ultimately included in the October quarterly report, it was never deposited into the ABCD PAC bank account. As a result, the report should have been amended to remove that contribution.

Again, the ABCD PAC takes full responsibility for the errors, but argues that the failure to amend its report to remove the never deposited \$100 contribution resulted in minimal harm to the public.

4) *Report Filing Issues*

When filing the January quarterly report, the PAC experienced difficulties entering information and finalizing the report. After correspondence with Commission staff, the PAC emailed a spreadsheet to Paul Lavin with all applicable information for the report. That spreadsheet contained one expenditure to ActBlue for \$19.75 but, that expenditure was not entered by Commission staff onto the report (or captured by the electronic filing system).

In this situation, the PAC argues that no violation occurred. The omission of the \$19.75 was entirely due to the electronic filing system – and the amount was given to the Commission in its spreadsheet before the filing deadline.

5) *Check "Receipt" Date Issue - Contributions Omitted from Reports*

The remaining issues brought to the Commission staff's attention by the PAC involve 9 checks which were inadvertently omitted from report filing because of the PAC's practice of utilizing the check issuance date as the date contributions were "received" for reporting purposes. As you know, the Commission rules state "the date of a contribution is the date it is received by a candidate..." Despite this rule, past practice of the PAC has been to use the date upon which the check is written as the date it is "received" by the PAC. While initially meant to simplify the reporting process, it has resulted in confusion on the PACs reports and many unnecessary amendments –and the unfortunate opportunity for contributions to go unreported.

By way of example, a contributor may issue a check for a particular date but then often doesn't physically deliver that check to the Treasurer or the PACs agents until weeks after the check is written. This becomes problematic and confusing when the interim week between when the check was written and when it is delivered crosses reporting periods. It essentially requires an extra step on the part of the filer who, despite having deposited (or received) the check in one period, has to go back and amend a prior report because the check issuance date is so far in the past. This is exactly what happened on

the dates outlined below. When making a deposit, the Treasurer noted a check dated in the past reporting period and simply forgot to go back and amend the prior report to include that contribution. Furthering the confusion, the PAC has not been able to pinpoint when many of the checks were "received" as outlined by the Commission rules so it's not entirely clear which of the reports need to be amended. We will certainly work with Commission staff to determine the best way to handle these amendments.

For the Commission's purposes, there were three deposits where this issue caused checks to go unreported:

- 1) On November 4, 2013, the ABCD PAC deposited 47 checks, 4 of which were dated in September 2013;
- 2) Early in the day on January 8, 2014, the ABCD PAC deposited 5 checks prior to the opening of the Second Regular Legislative Session; one of those checks was dated August 14, 2013;
- 3) Finally, on February 19, 2014, the PAC deposited 11 checks, 4 of which were written in December of 2013.

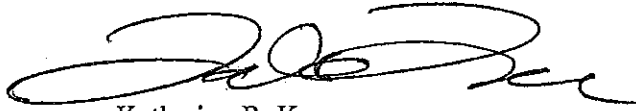
For all of the above instances, the PAC takes responsibility for not going back and amending its prior reports to reflect these contributions. The mistakes stem from a perhaps overly complicated internal system which opened the door for many extra steps in the reporting process. It was the Treasurer's best thinking at the time, having not been a PAC Treasurer before, that using the check issuance date was the proper thing to do. While certainly not improper, it did create confusion and lead to too many reports having to be amended – and as such – contributions which fell through cracks. Since these errors were discovered, the PAC has taken great pains to rethink its systems and will now use the physical possession date of the check as the date "received" which should help mitigate the need to make so many prior report amendments.

The issues laid out above are the result of an exhaustive internal review of all the ABCD PAC's records. The PAC wants to reiterate that it takes full responsibility for these mistakes as evidenced by its prompt self-reporting to this Commission. As a result of these mistakes, new procedures have been put in place to ensure that contributions and expenditures are properly and promptly disclosed to the public.

While it takes full responsibility for these violations, the PAC believes strongly that a fine of \$31,764.42 is vastly disproportionate to the mistakes and omissions made. It is the PAC's firm belief that the harm suffered to the public in this case is in no way commensurate with such an enormous fine. As such, the PAC requests that this Commission significantly reduce the preliminary penalty to mirror the relative severity of the violations.

Jonathan Wayne  
July 23, 2014  
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Sincerely,

A handwritten signature in black ink, appearing to read 'Katherine R. Knox', with a large, stylized initial 'K' and a long, sweeping underline.

Katherine R. Knox

**Maine Revised Statutes**  
**Title 21-A: ELECTIONS**  
**Chapter 13: CAMPAIGN REPORTS AND FINANCES**

**§1059. REPORT; FILING REQUIREMENTS**

Committees required to register under section 1052-A, 1053-B or 1056-B shall file an initial campaign finance report at the time of registration and thereafter shall file reports in compliance with this section. All reports must be filed by 11:59 p.m. on the day of the filing deadline, except that reports submitted to a municipal clerk must be filed by the close of business on the day of the filing deadline. [2013, c. 334, §27 (AMD) .]

**1. Contents; quarterly reports and election year reports.**

[ 2007, c. 443, Pt. A, §35 (RP) .]

**2. Reporting schedule. Committees shall file reports according to the following schedule.**

**A. All committees shall file quarterly reports:**

- (1) On January 15th, and the report must be complete as of December 31st;
- (2) On April 10th, and the report must be complete as of March 31st;
- (3) On July 15th, and the report must be complete as of June 30th; and
- (4) On October 5th, and the report must be complete as of September 30th. [2011, c. 691, Pt. A, §19 (RPR) .]

**B. General and primary election reports must be filed:**

- (1) On the 11th day before the date on which the election is held and must be complete as of the 14th day before that date; and
- (2) On the 42nd day after the date on which the election is held and must be complete as of the 35th day after that date. [2007, c. 443, Pt. A, §35 (AMD) .]

**C. Preelection and post-election reports for special elections or ballot measure campaigns must be filed:**

- (1) On the 11th day before the date on which the election is held and must be complete as of the 14th day before that date; and
- (2) On the 42nd day after the date on which the election is held and must be complete as of the 35th day after that date. [2011, c. 389, §45 (AMD) .]

**D. A committee that files an election report under paragraph B or C is not required to file a quarterly report when the deadline for that quarterly report falls within 10 days of the filing deadline established in paragraph B or C. [1991, c. 839, §29 (RPR) .]**

**E. A committee shall report any single contribution of \$5,000 or more received or single expenditure of \$1,000 or more made after the 14th day before the election and more than 24 hours before 5:00 p.m. on the day of the election within 24 hours of that contribution or expenditure. The treasurer is not required to include in this report expenditures for overhead expenses or compensation paid to an employee or other member of the campaign staff who has received payments at regular intervals that have been disclosed in previously filed campaign finance reports. As used in this paragraph, "overhead expenses" includes, but is not limited to, rent, utility payments, taxes, insurance premiums or similar administrative expenses. [2013, c. 334, §28 (AMD) .]**

[ 2013, c. 334, §28 (AMD) .]

Maine Revised Statutes  
Title 21-A: ELECTIONS  
Chapter 13: CAMPAIGN REPORTS AND FINANCES

**§1062-A. FAILURE TO FILE ON TIME**

1. **Registration.** A political action committee required to register under section 1052-A or 1053-B or a ballot question committee required to register under section 1056-B that fails to do so or that fails to provide the information required by the commission for registration may be assessed a fine of no more than \$2,500. In assessing a fine, the commission shall consider, among other things, whether the violation was intentional, the amount of campaign and financial activity that occurred before the committee registered, whether the committee intended to conceal its campaign or financial activity and the level of experience of the committee's volunteers and staff.

[ 2013, c. 334, §30 (AMD) .]

→ 2. **Campaign finance reports.** A campaign finance report is not timely filed unless a properly signed or electronically submitted copy of the report, substantially conforming to the disclosure requirements of this subchapter, is received by the commission by 11:59 p.m. on the date it is due. Except as provided in subsection 6, the commission shall determine whether a required report satisfies the requirements for timely filing. The commission may waive a penalty in whole or in part if it is disproportionate to the level of experience of the person filing the report or to the harm suffered by the public from the late disclosure. The commission may waive the penalty in whole or in part if the commission determines the failure to file a timely report was due to mitigating circumstances. For purposes of this section, "mitigating circumstances" means:

A. A valid emergency of the committee treasurer determined by the commission, in the interest of the sound administration of justice, to warrant the waiver of the penalty in whole or in part; [1999, c. 729, §9 (AMD) .]

B. An error by the commission staff; or [1999, c. 729, §9 (AMD) .]

C. Other circumstances determined by the commission that warrant mitigation of the penalty, based upon relevant evidence presented that a bona fide effort was made to file the report in accordance with the statutory requirements, including, but not limited to, unexplained delays in postal service or interruptions in Internet service. [2007, c. 443, Pt. A, §38 (AMD) .]

[ 2009, c. 190, Pt. A, §29 (AMD) .]

→ 3. **Basis for penalties.** The penalty for late filing of a report required under this subchapter is a percentage of the total contributions or expenditures for the filing period, whichever is greater, multiplied by the number of calendar days late, as follows:

A. For the first violation, 1%; [1995, c. 483, §21 (NEW) .]

B. For the 2nd violation, 3%; and [1995, c. 483, §21 (NEW) .]

C. For the 3rd and subsequent violations, 5%. [1995, c. 483, §21 (NEW) .]

Any penalty of less than \$10 is waived.

Violations accumulate on reports with filing deadlines in a 2-year period that begins on January 1st of each even-numbered calendar year. Waiver of a penalty does not nullify the finding of a violation.

A report required to be filed under this subchapter that is sent by certified or registered United States mail and postmarked at least 2 days before the deadline is not subject to penalty.

A required report may be provisionally filed by transmission of a facsimile copy of the duly executed report to the commission, as long as an original of the same report is received by the commission within 5 calendar days thereafter.

[ 2007, c. 443, Pt. A, §39 (AMD) .]

→ 4. Maximum penalties. The maximum penalty under this subchapter is \$10,000 for reports required under section 1056-B or section 1059, except that if the financial activity reported late exceeds \$50,000, the maximum penalty is 1/5 of the amount reported late.

[ 2011, c. 389, §49 (AMD) .]

5. Request for a commission determination. If the commission staff finds that a political action committee has failed to file a report required under this subchapter, the commission staff shall mail a notice to the treasurer of the political action committee within 3 business days following the filing deadline informing the treasurer that a report was not received. If a political action committee files a report required under this subchapter late, a notice of preliminary penalty must be forwarded to the treasurer of the political action committee whose report is not received by 11:59 p.m. on the deadline date, informing the treasurer of the commission staff finding of violation and preliminary penalty calculated under subsection 3 and providing the treasurer with an opportunity to request a determination by the commission. A request for determination must be made within 14 calendar days of receipt of the commission's notice. A principal officer or treasurer requesting a determination may either appear in person or designate a representative to appear on the principal officer's or treasurer's behalf or submit a sworn statement explaining the mitigating circumstances for consideration by the commission. A final determination by the commission may be appealed to the Superior Court in accordance with Title 5, chapter 375, subchapter 7 and the Maine Rules of Civil Procedure, Rule 80C.

[ 2013, c. 334, §31 (AMD) .]

6. Final notice of penalty. After a commission meeting, notice of the final determination of the commission and the penalty, if any, imposed pursuant to this subchapter must be sent to the principal officer and the treasurer of the political action committee.

If a determination is not requested, the preliminary penalty calculated by the commission staff is final. The commission staff shall mail final notice of the penalty to the principal officer and to the treasurer of the political action committee. A detailed summary of all notices must be provided to the commission.

[ 2009, c. 302, §9 (AMD) .]

7. List of late-filing committees. The commission shall prepare a list of the names of political action committees that are late in filing a report required under section 1059, subsection 2, paragraph B, subparagraph (1) or section 1059, subsection 2, paragraph C or D within 30 days of the date of the election and shall make that list available for public inspection.

[ 2007, c. 443, Pt. A, §41 (AMD) .]

8. Failure to file. A person who fails to file a report as required by this subchapter within 30 days of the filing deadline is guilty of a Class E crime, except that, if a penalty pursuant to subsection 8-A is assessed and collected by the commission, the State may not prosecute a violation under this subsection.

[ 2003, c. 628, Pt. A, §8 (AMD) .]

**8-A. Penalties for failure to file report.** The commission may assess a civil penalty for failure to file a report required by this subchapter. The maximum penalty for failure to file a report required under section 1056-B or section 1059 is \$10,000.

[ 2009, c. 190, Pt. A, §31 (AMD) .]

**9. Enforcement.** A penalty assessed pursuant to this section that has not been paid in full within 30 days after issuance of a notice of the final determination may be enforced in accordance with section 1004-B.

[ 2009, c. 302, §10 (RPR) .]

**SECTION HISTORY**

1995, c. 483, §21 (NEW). 1999, c. 426, §34 (AMD). 1999, c. 729, §9 (AMD). 2003, c. 628, §§A7-9 (AMD). 2007, c. 443, Pt. A, §§38-41 (AMD). 2009, c. 190, Pt. A, §§28-31 (AMD). 2009, c. 302, §§8-10 (AMD). 2011, c. 389, §49 (AMD). 2013, c. 334, §§30, 31 (AMD).

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JUL 18 2014

Maine Ethics Commission

### Discovery

On July 2nd, 2014, I deposited \$23,970.88, my first deposit since February 2014. Later in the day, I was asked how much cash on hand the ABCD PAC had. Not having a bank statement handy, I pulled up April 2014 Quarterly Report, added the July 2nd deposit to the reported cash on hand, and it seemed too high to me. Later that day, I checked my most recent bank statement and noticed the discrepancy between what I had in bank versus what was reported on April 2014 Quarterly.

The next day, I requested the check images from Gorham Savings Bank for all deposits and checks written from July 2013 to Jan 2014. After an extensive internal audit, I discovered the following discrepancies.

### Reporting History

Since the inception of ABCD PAC I have always reported contributions based on date written on check and amend previous reports.

#### October 2013 Quarterly Report (Jul '13 - Sep '13)

In October of last year, I was managing a home renovation and preparing to move, and subsequently practiced poor records keeping.

##### Item 1

On July 31, 2013, I wrote a check for \$6,500 to the Maine Democratic Party, and forgot to report it on the October 2013 Quarterly Report. This expenditure was properly reported as a contribution to the MDP on their October 2013 Quarterly Report.

*Action:* Amend Oct '13 QR to reflect expenditure of \$6,500 to the MDP on August 2nd, 2013.

##### Item 2

On August 22nd, I deposited 9 checks, and failed to report the last check I physically received and the latest dated check in the batch. This was a contribution of \$1,500 from George Campbell dated August 19th, 2013.

*Action:* Amend Oct '13 QR to reflect a contribution of \$1,500 from George Campbell on August 19, 2013.

##### Item 3

On September 3rd, I received a check from Hub Furniture for \$100. I made a record of receiving this check, but lost it before it could be deposited. I reported it as \$100 contribution on the Oct '13 report.

*Action:* Amend Oct '13 QR to remove contribution of \$100 from Hub Furniture on September 3, 2013.

##### Item 4

On November 5th, I deposited 47 checks and \$49 cash. While most of these checks were dated for October and November, the following 4 checks were dated for September, and I forgot to amend the October 2013 Quarterly Report to reflect these contributions. I don't remember when I physically received the checks but my practice has always been to go to the date on the check.

- \$1,500 from Anheuser Busch on September 6th, 2013
- \$750 from the Maine Association of Anesthesiologists on September 19th, 2013
- \$250 from Merck on September 27th, 2013
- \$1,000 from Maine Beverage Association on September 30th, 2013.

*Action:* Looking for advice on how to handle these checks. Amend the Oct '13 QR to reflect these four contributions.



**Item 5**

Early in the day on January 8th, I deposited 5 checks before the opening of Second Regular Session. One of those checks was for \$1,000 from Aetna dated August 14th, 2013. With the new electronic filing system in place from Ethics, I was confused as to how to file amendments, and intended to follow-up and ask how to amend the past report. In the flurry of session starting and moving in to my new home, I forgot.

*Action:* Amend the Oct '13 QR to reflect a contribution of \$1,000 from Aetna on August 14th, 2013.

**January 2014 Quarterly Report (Oct '13 to Dec '13)**

During this time, the Second Session was starting, and I was also in the process of moving to a new home. I practiced poor record keeping during this time.

**Item 1**

On October 4th, 2013, I wrote a check for \$18,000 to the Maine Democratic Party, and forgot to report it on the January 2014 Quarterly Report. This expenditure was properly reported as a contribution to the MDP on their January 2014 Quarterly Report.

*Action:* Amend Jan '14 QR to reflect expenditure of \$18,000 to the MDP on August 2nd, 2013.

**Item 2**

On November 5th, I deposited 47 checks and \$49 cash. I forgot to report the \$49 cash.

*Action:* Amend the Jan '14 QR to reflect a cash contribution of \$49.

**Item 3**

When filing the January 2014 Quarterly Report, I had some difficulty filing my report. After some correspondence with Paul Lavin, I emailed him a spreadsheet to meet the midnight deadline. While an expenditure for \$19.75 to ActBlue on December 31st for credit card processing fees was included in that spreadsheet, for some reason, it did not end up on the submitted report.

*Action:* Amend the Jan '14 QR to reflect an expenditure to ActBlue for \$19.75 on December 31, 2013 for credit card processing fees.

**Item 4**

On February 19th, I deposited 11 checks. While 7 of these checks were dated for January and February, the following 4 checks were dated for December, and I forgot to amend the January 2014 Quarterly Report to reflect these contributions.

- \$100 from Clara Porter on December 26th, 2013
- \$100 from Tom Alnsworth on December 29th, 2013
- \$100 from David Garrity on December 30th, 2013
- \$100 from Don Perkins on December 31th, 2013.

*Action:* Amend the Jan '14 QR to reflect these four contributions.

## **April 2014 Quarterly Report (Jan '14 - Mar '14)**

### **Item 1**

On January 6th and 7th, I deposited two separate checks from Churchill Downs for \$1,500 each. One of these checks was cancelled, and I received a Chargeback of \$1,500 and a \$15 Chargeback Fee.

*Action:* Amend the Apr '14 QR to reflect the Chargeback for \$1,500 and the fee for \$15.

### **Summary**

Of the 11 contributions I failed to report, 9 of them were checks dated for a particular Quarterly Report, but received and deposited after that Quarterly Report was due. The way I had been reporting it, I was straddling reporting periods. Created confusion. I failed to properly amend past reports to reflect these contributions. The other 2 were a \$49 cash contribution and a \$1,500 check I failed to record.

Of the 3 expenditures I failed to report, 2 were correctly reported as contributions by the recipient (Maine Democratic Party), and one was technically reported but failed to end up on the final report.

Of the 3 miscellaneous credits, one was a check that received and reported, but lost and never actually deposited. The other two were a chargeback of \$1,500 and an associated \$15 fee.

Bank Total (As of July 1st, 2014)	\$102,861.72
Reported Total (As of July 1st, 2014)	\$122,547.47
Difference	-\$19,685.75

Quarterly Report	Date	Note	Deposit	Withdrawl	Running Reported Total	Difference
		Starting July 1st, 2014			\$122,547.47	\$19,685.75
Oct13	7/31/2013	MDP Check		\$6,500.00	\$116,047.47	\$13,185.75
Oct13	8/14/2013	Aetna	\$1,000.00		\$117,047.47	\$14,185.75
Oct13	8/19/2013	George Campbell	\$1,500.00		\$118,547.47	\$15,685.75
		Reported Lost Hub Furniture				
Oct13	9/3/2013	Check		\$100.00	\$118,447.47	\$15,585.75
Oct13	9/6/2013	Anheuser Busch	\$1,500.00		\$119,947.47	\$17,085.75
		Maine Society of				
Oct13	9/19/2013	Anesthesiologists	\$750.00		\$120,697.47	\$17,835.75
Oct13	9/27/2013	Merck	\$250.00		\$120,947.47	\$18,085.75
Oct13	9/30/2013	Maine Beverage Assn	\$1,000.00		\$121,947.47	\$19,085.75
Jan14	10/4/2013	MDP Check		\$18,000.00	\$103,947.47	\$1,085.75
Jan14	11/5/2013	CASH	\$49.00		\$103,996.47	\$1,134.75
Jan14	12/31/2013	Non-Reported AB Fees		\$19.75	\$103,976.72	\$1,115.00
Jan14	12/26/2013	Clara Porter	\$100.00		\$104,076.72	\$1,215.00
Jan14	12/29/2013	Tom Alnsworth	\$100.00		\$104,176.72	\$1,315.00
Jan14	12/30/2013	David Ganity	\$100.00		\$104,276.72	\$1,415.00
Jan14	12/31/2013	Don Perkins	\$100.00		\$104,376.72	\$1,515.00
Apr14	1/9/2014	Chargeback		\$1,500.00	\$102,876.72	\$15.00
Apr14	1/9/2014	Chargeback Fee		\$15.00	\$102,861.72	\$0.00
			\$6,449.00	\$26,134.75	\$19,685.75	



COMMISSION ON GOVERNMENTAL ETHICS AND ELECTION PRACTICES  
Mail: 135 State House Station, Augusta, Maine 04333  
Office: 45 Memorial Circle, Augusta, Maine

Website: [www.maine.gov/ethics](http://www.maine.gov/ethics)  
Phone: 207-287-4179  
Fax: 207-287-6775

## 2013 CAMPAIGN FINANCE REPORT FOR POLITICAL ACTION COMMITTEES

COMMITTEE INFORMATION		
ALFOND BUSINESS, COMMUNITY & DEMOCRACY 134 SHERIDAN STREET PORTLAND, ME 04101	TEL: (207)828-0277 FAX: EMAIL: <a href="mailto:jalfond@gmail.com">jalfond@gmail.com</a>	
TREASURER		
JUSTIN ALFOND 134 SHERIDAN STREET PORTLAND, ME 04101	TEL: (207)828-0277 EMAIL: <a href="mailto:jalfond@gmail.com">jalfond@gmail.com</a>	
TYPE OF REPORT	DUE DATE	REPORTING PERIOD
QUARTERLY - OCTOBER	10/7/2013	7/1/2013 - 9/30/2013
NO FINANCIAL ACTIVITY IN THIS REPORTING PERIOD FOR SCHEDULES B, C, D		
CERTIFICATION		
<p>I, JUSTIN ALFOND, CERTIFY THAT THE INFORMATION CONTAINED IN THIS REPORT IS TRUE, ACCURATE AND COMPLETE TO THE BEST OF MY KNOWLEDGE.</p> <p>REPORT FILED BY: JUSTIN ALFOND REPORT FILED ON: October 07, 2013</p> <p>IF THIS REPORT IS FILED BY AN AUTHORIZED AGENT OF THE COMMITTEE, THE TREASURER AND AGENT ARE LIABLE FOR ANY VIOLATIONS OF MAINE CAMPAIGN FINANCE LAW (21-A M.R.S.A. CHAPTER 13) AND THE COMMISSION'S RULES THAT MAY RESULT FROM THE FILING OF A FALSE OR INACCURATE REPORT.</p>		

UNSWORN FALSIFICATION IS A CLASS D CRIME (17-A M.R.S.A. § 453).

### SCHEDULE A CASH CONTRIBUTIONS

- For contributors who gave more than \$50, the names, address, occupation, and employer must be reported. If "information requested" is listed instead of occupation and employer, the candidate is waiting to receive that information.
- Cash contributions of \$50 or less can be added together and reported as a lump sum.
- Contributor Types
 

1 = Individuals	4 = Party Committees
2 = Commercial Sources	5 = Candidate Committees
3 = Political Action Committees	6 = Unitemized Contributions

DATE RECEIVED	CONTRIBUTOR	OCCUPATION AND EMPLOYER	TYPE	AMOUNT
08/01/2013	LISA GORMAN P O BOX 1027 YARMOUTH ME 04096	NOT EMPLOYED NOT EMPLOYED	1	\$1,500.00
08/02/2013	CATHERINE LEE 200 MAIN STREET WESTBROOK ME 04092	LAWYER LEE INTERNATIONAL (SELF)	1	\$1,000.00
08/08/2013	THOMAS PLATZ 2 GREAT FALLS AUBURN ME 04210	PRESIDENT PLATZ ASSOCIATES	1	\$500.00
08/13/2013	BRIAN ENG 33 STORER ST PORTLAND ME 04102	INSURANCE SELF-EMPLOYED	1	\$250.00
08/15/2013	DAVID TRUDT 7 BEAVER PLACE BOSTON MA 02108	DIRECTOR BRANDOT INTERNATIONAL	1	\$1,500.00
08/15/2013	TW SATURLEY 2 MONUMENT SQUARE 6TH FLOOR PORTLAND ME 04101	PRESIDENT TRANZON AUCTION PROPERTIES	1	\$500.00
08/16/2013	BETSY BIEMANN 34 WILDBERRY LANE BRUNSWICK ME 04011	CONSULTANT SELF	1	\$25.00
08/16/2013	JAMES CLAIR PO BOX 6240 CHINA VILLAGE ME 04926	THE WALDRON GROUP	1	\$2,500.00
08/16/2013	LISHAN AKLOG 6216 E SHEA BLVD SCOTTSDALE AZ 85254	HEART SURGEON CHW	1	\$1,500.00
08/18/2013	DAVID WHISTON 135 SHERIDAN STREET PORTLAND ME 04101	NOT EMPLOYED NONE	1	\$3,000.00
08/19/2013	DONATO TRAMUTO P.O. BOX 1728 OGUNQUIT ME 03907	CHAIRMAN PHYSICIANS INTERACTIVE	1	\$1,500.00
08/19/2013	HOWARD SALZBERG 401 EAST 80TH STREET 28EF NEW YORK NY 10075	CAMP DIRECTOR CAMP MODIN	1	\$2,000.00

08/21/2013	AILEEN AGNEW 459 LEDGE ROAD YARMOUTH ME 04096	NOT EMPLOYED NONE	1	\$500.00
08/21/2013	LISA MARKUSHEWSKI P.O. BOX 4733 PORTLAND ME 04112	HOMEMAKER UNEMPLOYED	1	\$100.00
08/21/2013	MARIA FUENTES 21 UNION STREET HALLOWELL ME 04347	DIRECTOR MAINE BETTER TRANSPORTATION ASSOCIATION	1	\$250.00
08/22/2013	JEFFREY ROMANO 21 UNION STREET HALLOWELL ME 04347	INFORMATION REQUESTED INFORMATION REQUESTED	1	\$250.00
08/23/2013	MORRIS FISHER 31 CROSSING BROOK RD CUMBERLAND CENTER ME 04021	REAL ESTATE CBRE   THE BOULOS COMPANY	1	\$500.00
08/26/2013	ALLAN WATSON 111 WEST 113TH STREET APT 6A NEW YORK NY 10026	WISDOM HILL LLC EXECUTIVE	1	\$1,500.00
08/26/2013	ALLAN WATSON 111 WEST 113TH STREET APT 6A NEW YORK NY 10026	WISDOM HILL LLC EXECUTIVE	1	\$1,500.00
08/26/2013	CYRUS HAGGE 225 COMMERCIAL ST SUITE 502 PORTLAND ME 04101	BUSINESSMAN SELF	1	\$6,000.00
08/26/2013	JEREMY HINES 333 EAST 102ND STREET APT 838 NEW YORK NY 10029	DIRECTOR - SALES OPERATION UNIVISION INTERACTIVE MEDIA	1	\$1,500.00
08/27/2013	JOAN ALFOND 14 OTIS PL BOSTON MA 02108	CONCIERGE CONCIERGE SERVICES FOR STUDENTS	1	\$3,000.00
08/27/2013	LARRY CARRIER PO BOX 712 WILTON ME 04294	LOGGING EJ CARRIER INC.	1	\$3,000.00
08/27/2013	WILLIAM CREIGHTON 74 BOW STREET FREEPORT ME 04032	RETIRED NONE	1	\$1,500.00
08/31/2013	KENNETH WEXLER 112 CROCKETTS BEACH RD OWL'S HEAD ME 04854	RETIRED RETIRED	1	\$1,500.00
09/03/2013	JOHN WILSON 81 SPRUCE POINT VIEW RD CHEBEAGUE ISLAND ME 04107	RETIRED NONE	1	\$200.00
09/04/2013	JOSEPH PORTA 207 FORE ST #12 PORTLAND ME 04101	REAL ESTATE BROKER BOULOS COMPANY	1	\$1,500.00
09/06/2013	ALLAN LABOS 21 LOOKOUT DR FREEPORT ME 04032	OWNER AKARI	1	\$250.00
09/08/2013	EILEEN SKINNER 124 WOODLANDS DR FALMOUTH ME 04105	CEO MERCY HOSPITAL	1	\$250.00
09/11/2013	WILLIAM ROBINSON 1730 RHODE ISLAND AVENUE WASHINGTON DC 20036	CONSULTANT THE NEW MEDIA FIRM	1	\$3,000.00

09/19/2013	GARY VOGEL 110 GRANITE ST YARMOUTH ME 04096	ATTORNEY DRUMMOND WOODSUM	1	\$500.00
09/19/2013	GORDON SMITH PO BOX 368 EAST WINTHROP ME 04343	EXECUTIVE VICE PRESIDENT MAINE MEDICAL ASSOCIATION	1	\$750.00
09/19/2013	JOEY JOSEPH 128 RIDGE RD FAIRFIELD ME 04937	PRESIDENT COLDBROOK SAAB	1	\$1,500.00
08/09/2013	SHAPIRO GIRLS LLC 204 US ROUTE ONE FALMOUTH ME 04105		2	\$1,500.00
08/13/2013	BRADY ENTERPRISES INC. PO BOX 7486 PORTLAND ME 04112		2	\$1,500.00
08/20/2013	NAPPI DISTRIBUTORS 615 MAIN STREET GORHAM ME 04038		2	\$750.00
08/21/2013	LAW OFFICES OF JOE BORNSTEIN PO BOX 4686 PORTLAND ME 04112		2	\$2,500.00
08/21/2013	MAINE REAL ESTATE & DEVELOPMENT ASSOCIATION 2 MARKET STREET SUITE 5B PORTLAND ME 04101		2	\$500.00
08/27/2013	BANGOR SAVINGS BANK 84 MARGINAL WAY SUITE 100 PORTLAND ME 04101		2	\$250.00
08/29/2013	EAST BROWN COW MANAGEMENT 100 COMMERCIAL ST PORTLAND ME 04101		2	\$1,500.00
08/30/2013	CIANBRO 101 CIANBRO SQ PITTSFIELD ME 04957		2	\$400.00
08/30/2013	NATIONAL DISTRIBUTORS 116 WALLACE AVE SOUTH PORTLAND ME 04106		2	\$750.00
09/03/2013	HUB FURNITURE CO. 291 FORE ST PORTLAND ME 04101		2	\$100.00
09/03/2013	SHARON A SUDBAY COMPANY LLC 108 MONUMENT STREET PORTLAND ME 04101		2	\$250.00
09/03/2013	VERRILL DANA LLP ONE PORTLAND SQUARE PORTLAND ME 04112		2	\$1,000.00
09/04/2013	JACOBS CHIROPRACTIC ACUPUNCTURE PA 138 ST. JOHN ST PORTLAND ME 04102		2	\$250.00
09/04/2013	PIKE INDUSTRIES INC 3 EASTGATE PARK RD BELMONT NH 03220		2	\$400.00

09/05/2013	EATON PEABODY 80 EXCHANGE ST BANGOR ME 04402		2	\$250.00
09/05/2013	PIERCE ATWOOD 77 WINTHROP ST AUGUSTA ME 04330		2	\$1,250.00
09/05/2013	PLUM CREEK ADMINISTRATIVE CORP INC. PO BOX 1990 COLUMBIA FALLS MT 59912		2	\$1,500.00
09/05/2013	WRIGHT-RYAN CONSTRUCTION 10 DANFORTH ST PORTLAND ME 04101		2	\$250.00
09/06/2013	FIRST WIND ENERGY LLC 179 LINCOLN STREET SUITE 500 BOSTON MA 02111		2	\$1,500.00
09/06/2013	MITCHELL TARDY 106 SEWALL ST AUGUSTA ME 04330		2	\$1,500.00
09/09/2013	DRUMMOND WOODSUM & MACMAHON 84 MARGINAL WAY SUITE 600 PORTLAND ME 04101		2	\$500.00
09/10/2013	HEALTH CARE RESOURCES INC. 125 NORTH ELM STREET WESTFIELD MA 01065		2	\$250.00
09/10/2013	SEBAGO BREWING COMPANY 164 MIDDLE STREET PORTLAND ME 04101		2	\$250.00
09/11/2013	MAINE STREET DESIGN CO 239 HARPSWELL ISLAND RD HARPSWELL ME 04079		2	\$250.00
09/12/2013	BERNSTEIN SHUR 100 MIDDLE STREET PORTLAND ME 04104		2	\$1,500.00
09/12/2013	DIAGEO NORTH AMERICA INC 801 MAIN AVE NORWALK CT 06851		2	\$500.00
09/12/2013	STEPHEN D BRANN BUILDING & REMODELING 39 SOUTH FREEPORT RD FREEPORT ME 04032		2	\$250.00
09/13/2013	BROOKFIELD POWER US ASSET MANAGEMENT LLC 200 DONALD LYNCH BOULEVARD SUITE 300 MARLBOROUGH MA 01752		2	\$3,000.00
09/16/2013	WESTERN MAINE REALTY LLC 549 SOUTH ST QUINCY MA 02169		2	\$1,500.00
09/17/2013	MAINE AUTOMOBILE DEALERS ASSN INC 180 CIVIC CENTER DR AUGUSTA ME 04330		2	\$250.00
09/17/2013	MAINE REAL ESTATE & DEVELOPMENT ASSOCIATION 2 MARKET STREET SUITE 5B PORTLAND ME 04101		2	\$400.00



09/18/2013	PHRMA 950 F STREET NW SUITE 300 WASHINGTON DC 20004		2	\$1,500.00
09/18/2013	REED & REED INC PO BOX 370 WOOLWICH ME 04579		2	\$1,500.00
09/18/2013	SARGENT CORPORATION PO BOX 435 STILLWATER ME 04489		2	\$400.00
09/19/2013	CENTER FOR BEHAVIORAL HEALTH HA INC 66 PAVILLION AVE PROVIDENCE RI 02905		2	\$125.00
09/19/2013	CENTER FOR BEHAVIORAL HEALTH HA INC 66 PAVILLION AVE PROVIDENCE RI 02905		2	\$125.00
09/19/2013	MOLINA HEALTHCARE INC 200 OCEANGATE SUITE 100 LONG BEACH CA 90802		2	\$500.00
09/19/2013	THE 7TH LEVEL 291 STATE ST PORTLAND ME 04101		2	\$400.00
09/19/2013	UNITIL 6 LIBERTY LANE WEST HAMPTON NH 03842		2	\$1,500.00
09/19/2013	WH DEMMONS INC 93 WARREN AVE PORTLAND ME 04103		2	\$1,510.00
09/24/2013	MCTEAGUE HIGBEE 4 UNION PARK TOPSHAM ME 04086		2	\$1,500.00
09/24/2013	NORTHEAST LABORATORY SERVICES PO BOX 788 WATERVILLE ME 04903		2	\$500.00
09/26/2013	PORTLAND LONGSHOREMAN'S BENEVOLENT SOCIETY ILA LOCAL 861 PO BOX 8141 PORTLAND ME 04104		2	\$500.00
07/30/2013	MAINE OPTOMETRISTS PAC 72 WESTERN AVE STE 1 AUGUSTA ME 04330		3	\$1,000.00
07/31/2013	MAINE DENTAL PAC PO BOX 215 MANCHESTER ME 04351		3	\$1,500.00
08/28/2013	IUPAT DISTRICT COUNCIL #35 25 COLGATE RD SUITE 305 ROSLINDALE MA 02131		3	\$500.00
09/03/2013	SCI/PAC PO BOX 130548 HOUSTON TX 77219		3	\$1,500.00
09/09/2013	CLEAN POWER PAC PO BOX 743 AUGUSTA ME 04332		3	\$1,500.00

09/11/2013	PAINT PAC 1500 RHODE ISLAND AVE NW WASHINGTON DC 20005		3	\$250.00
09/19/2013	ME TRUCKPAC PO BOX 857 AUGUSTA ME 04330		3	\$500.00
07/31/2013			6	\$5.00
09/19/2013			6	\$720.00
09/16/2013	WAL-MART STORES, INC. 702 SW 8TH STREET BENTONVILLE AR 72716		2	\$500.00
TOTAL CASH CONTRIBUTIONS ⇒				\$89,410.00

### SCHEDULE A - 1 IN-KIND CONTRIBUTIONS

- In-kind contributions are goods and services (including facilities) that a committee received at no cost or at a cost less than the fair market value. They include all goods and services purchased for the campaign by the committee or supporters if the campaign does not expect to reimburse the committee or supporter. These contributions may come from the committee, supporters, PACs, party committees, or other entities.
- For contributors who gave more than \$50, the name, address, occupation, and employer must be reported. If "information requested" is listed instead of occupation and employer, the committee is waiting to receive that information.
- In-kind contributions of \$50 or less can be added together and reported as a lump sum.
- If the committee received a discount on goods and services, the amount of the discount must be reported as an in-kind contribution.
- Contributor Types
 

1 = Individuals	4 = Party Committees
2 = Commercial Sources	5 = Candidate Committees
3 = Political Action Committees	6 = Unitemized Contributions

DATE RECEIVED	CONTRIBUTOR	OCCUPATION AND EMPLOYER	DESCRIPTION (of goods, services, facilities, or discounts received)	TYPE	VALUE (estimated fair market value)
08/07/2013	JUSTIN L ALFOND 134 SHERIDAN STREET PORTLAND ME 04101	STATE SENATOR STATE OF MAINE - SENATE DISTRICT 8	POSTAGE	1	\$92.00
08/08/2013	JUSTIN L ALFOND 134 SHERIDAN STREET PORTLAND ME 04101	STATE SENATOR STATE OF MAINE - SENATE DISTRICT 8	POSTAGE	1	\$46.00
08/27/2013	JUSTIN L ALFOND 134 SHERIDAN STREET PORTLAND ME 04101	STATE SENATOR STATE OF MAINE - SENATE DISTRICT 8	EVENT FEES	1	\$3,884.93
08/27/2013	JUSTIN L ALFOND 134 SHERIDAN STREET PORTLAND ME 04101	STATE SENATOR STATE OF MAINE - SENATE DISTRICT 8	EVENT FEES	1	\$760.44
08/27/2013	JUSTIN L ALFOND 134 SHERIDAN STREET PORTLAND ME 04101	STATE SENATOR STATE OF MAINE - SENATE DISTRICT 8	SUPPLIES FOR EVENT	1	\$28.92
08/27/2013	JUSTIN L ALFOND 134 SHERIDAN STREET PORTLAND ME 04101	STATE SENATOR STATE OF MAINE - SENATE DISTRICT 8	TRANSPORTATION FOR EVENT	1	\$975.00
09/18/2013	JUSTIN L ALFOND 134 SHERIDAN STREET PORTLAND ME 04101	STATE SENATOR STATE OF MAINE - SENATE DISTRICT 8	LETTERHEAD	1	\$72.45
09/18/2013	JUSTIN L ALFOND 134 SHERIDAN STREET PORTLAND ME 04101	STATE SENATOR STATE OF MAINE - SENATE DISTRICT 8	SUPPLIES FOR EVENT	1	\$61.37
09/19/2013	JUSTIN L ALFOND 134 SHERIDAN STREET PORTLAND ME 04101	STATE SENATOR STATE OF MAINE - SENATE DISTRICT 8	EVENT FEES	1	\$7,591.00

TOTAL IN-KIND CONTRIBUTIONS ⇒

\$13,512.11

ALFOND BUSINESS, COMMUNITY &amp; DEMOCRACY PAC

SCHEDULE B-1 ONLY

**SCHEDULE B - 1  
OPERATING EXPENDITURES**

EXPENDITURE TYPES	
CNS Campaign consultants	POL Polling and survey research
CON Contribution to other candidate, party, committee	POS Postage for U.S. Mail and mail box fees
EQP Equipment (office machines, furniture, cell phones, etc.)	PRO Other professional services
FND Fundraising events	PRT Print media ads only (newspapers, magazines, etc.)
FOD Food for campaign events, volunteers	RAD Radio ads, production costs
LIT Print and graphics (flyers, signs, palmcards, t-shirts, etc.)	SAL Campaign workers' salaries and personnel costs
MHS Mail house (all services purchased)	TRV Travel (fuel, mileage, lodging, etc.)
OFF Office rent, utilities, phone and internet services, supplies	TVN TV or cable ads, production costs
OTH Other	WEB Website design, registration, hosting, maintenance, etc.
PHO Phone banks, automated telephone calls	
<i>Only these expenditure types require a remark: CNS, OTH, PRO.</i>	

DATE OF EXPENDITURE	PAYEE	REMARK	TYPE	AMOUNT
08/04/2013	ACTBLUE MAINE PO BOX 382110 CAMBRIDGE, MA 02238	Credit card fees	OTH	\$98.95
08/18/2013	ACTBLUE MAINE PO BOX 382110 CAMBRIDGE, MA 02238	Credit card fees	OTH	\$188.62
08/25/2013	ACTBLUE MAINE PO BOX 382110 CAMBRIDGE, MA 02238	Credit card fees	OTH	\$161.95
09/02/2013	ACTBLUE MAINE PO BOX 382110 CAMBRIDGE, MA 02238	Credit card fees	OTH	\$177.75
09/15/2013	ACTBLUE MAINE PO BOX 382110 CAMBRIDGE, MA 02238	Credit card fees	OTH	\$118.50
<b>TOTAL EXPENDITURES</b> ➡				<b>\$745.77</b>

**SCHEDULE F  
SUMMARY SCHEDULE**

<b>CASH ACTIVITY</b>		
<b>RECEIPTS</b>	<b>TOTAL FOR THIS PERIOD</b>	<b>TOTAL FOR YEAR</b>
1. CASH CONTRIBUTIONS (Schedule A)	\$89,410.00	\$89,610.00
2. OTHER CASH RECEIPTS (interest, etc.)	\$0.00	\$0.00
3. LOANS (Schedule C, new loans and additional amounts loaned)	\$0.00	\$0.00
4. TOTAL RECEIPTS (lines 1+2+3)	\$89,410.00	\$89,610.00
<b>EXPENDITURES</b>		
5. EXPENDITURES TO SUPPORT OR OPPOSE (Schedule B)	\$0.00	\$0.00
6. OPERATING EXPENDITURES (Schedule B-1)	\$745.77	\$922.15
7. LOAN REPAYMENTS (Schedule C)	\$0.00	\$0.00
8. TOTAL PAYMENTS (lines 5+6+7)	\$745.77	\$922.15
<b>CASH SUMMARY</b>		
9. CASH BALANCE AT BEGINNING OF PERIOD (from last report)	\$6,989.79	
10. PLUS TOTAL RECEIPTS THIS PERIOD (line 4 above)	\$89,410.00	
11. MINUS TOTAL PAYMENTS THIS PERIOD (line 8 above)	\$745.77	
12. CASH BALANCE AT END OF PERIOD	\$95,654.02	
<b>OTHER ACTIVITY</b>		
	<b>TOTAL FOR THIS PERIOD</b>	<b>TOTAL FOR YEAR</b>
13. IN-KIND CONTRIBUTIONS (Schedule A-1)	\$13,512.11	\$13,512.11
14. TOTAL LOAN BALANCE AT END OF PERIOD (Schedule C)	\$0.00	
15. TOTAL UNPAID DEBTS AT END OF PERIOD (Schedule D)	\$0.00	



Commission on Governmental Ethics and Election Practices  
Mail: 135 State House Station, Augusta, Maine 04333  
Office: 45 Memorial Circle, Augusta, Maine  
Website: [www.maine.gov/ethics](http://www.maine.gov/ethics)  
Phone: 207-287-4179  
Fax: 207-287-6775

## 2013 CAMPAIGN FINANCE REPORT

### FOR POLITICAL ACTION COMMITTEES

COMMITTEE		TREASURER	
Alfond Business, Community & Democracy PAC 134 Sheridan Street Portland, ME 04101 PHONE: (207) 828-0277		Justin Alfond 134 Sheridan Street Portland, ME 04101 EMAIL: <a href="mailto:jalfond@gmail.com">jalfond@gmail.com</a>	
REPORT	DUE DATE	REPORTING PERIOD	
JANUARY QUARTERLY	01/15/2014	10/01/2013 - 12/31/2013	

#### FINANCIAL ACTIVITY SUMMARY

RECEIPTS	TOTAL FOR PERIOD	TOTAL FOR YEAR
1. CASH CONTRIBUTIONS (SCHEDULE A)	\$38,790.00	\$128,400.00
2. OTHER CASH RECEIPTS (INTEREST, ETC.)	\$0.00	\$0.00
3. LOANS (SCHEDULE C)	\$0.00	\$0.00
4. TOTAL RECEIPTS (LINE 1 + 2 + 3)	\$38,790.00	\$128,400.00
EXPENDITURES		
5. EXPENDITURES TO SUPPORT OR OPPOSE (SCHEDULE B)	\$0.00	\$0.00
6. OPERATING EXPENDITURES (SCHEDULE B-1)	\$182.72	\$1,104.87
7. LOAN REPAYMENTS (SCHEDULE C)	\$0.00	\$0.00
8. TOTAL PAYMENTS (LINE 5 + 6 + 7)	\$182.72	\$1,104.87
CASH SUMMARY		
9. CASH BALANCE AT BEGINNING OF PERIOD	\$95,654.02	
10. PLUS TOTAL RECEIPTS THIS PERIOD (LINE 4)	\$38,790.00	
11. MINUS TOTAL PAYMENTS THIS PERIOD (LINE 8)	\$182.72	
12. CASH BALANCE AT END OF PERIOD	\$134,261.30	
OTHER ACTIVITY		
13. IN-KIND CONTRIBUTIONS (SCHEDULE A-1)	\$0.00	\$13,512.11
14. TOTAL LOAN BALANCE AT END OF PERIOD (SCHEDULE C)	\$0.00	
15. TOTAL UNPAID DEBTS AT END OF PERIOD (SCHEDULE D)	\$0.00	

I, JUSTIN ALFOND, CERTIFY THAT THE INFORMATION CONTAINED IN THIS REPORT IS TRUE, ACCURATE, AND COMPLETE TO THE BEST OF MY KNOWLEDGE.

REPORT FILED BY: JUSTIN ALFOND  
REPORT FILED ON: 01/15/2014  
LAST MODIFIED: 01/15/2014  
PRINTED: 07/23/2014  
COMMITTEE ID: 4510

## SCHEDULE A CASH CONTRIBUTIONS

- For contributors who gave more than \$50, the names, address, occupation, and employer must be reported. If "information requested" is listed instead of occupation and employer, the candidate is waiting to receive that information.
- Cash contributions of \$50 or less can be added together and reported as a lump sum.
- Contributor Types

1 = Individual

2 = Candidate/ Spouse/ Domestic Partner

3 = Commercial Source

4 = Nonprofit Organization

5 = Political Action Committee

6 = Political Party Committee

7 = Ballot Question Committee

8 = Other Candidate/ Candidate Committee

9 = Candidate / Candidate Committee

10 = General Treasury Transfer

11 = Transfer from Previous Campaign

12 = Contributors giving \$50 or less

13 = Contributors giving \$100 or less

14 = Contributors giving \$200 or less

15 = MCEA Payment

16 = Financial Institution

DATE RECEIVED	CONTRIBUTOR	OCCUPATION AND EMPLOYER	TYPE	AMOUNT
10/4/2013	JOHN FERLAND 2 BIRCH LANE CUMBERLAND FORESIDE, ME 4110	OCEAN RENEWABLE POWER COMPANY  DESCRIPTION: VP PROJECT DEVELOPMENT	1	\$400.00
10/7/2013	ALLAGASH BREWING COMPANY INC. 50 INDUSTRIAL WAY PORTLAND, ME 4103		3	\$500.00
10/7/2013	FAIRPOINT REQUESTED PORTLAND, ME 4104		3	\$800.00
10/7/2013	NAIFA-ME PAC 85 CHURCH ST BELFAST, ME 4915		5	\$400.00
10/9/2013	MITCHELL TARDY 106 SEWALL ST AUGUSTA, ME 4330		3	\$500.00
10/10/2013	GERARD CONLEY 106 GLECKLER RD PORTLAND, ME 4103	CLOUTIER CONLEY & DUFFETT  DESCRIPTION: Attorney/Legal	1	\$100.00
10/11/2013	RONALD BANCROFT 12 OCTOBER FARM LANE CUMBERLAND, ME 4021	SELF  DESCRIPTION: SELF	1	\$100.00
10/11/2013	BANGOR HISTORIC TRACK 500 MAIN STREET BANGOR, ME 4401		3	\$500.00
10/11/2013	DANIEL PEARL 14 GRETA WAY FALMOUTH, ME 4105	SELF  DESCRIPTION: SELF	1	\$500.00
10/11/2013	EDWIN PERT 131 WEBBER RD GEORGETOWN, ME 4548	RETIRED  DESCRIPTION: Retired	1	\$125.00



10/12/2013	JOHN MURPHY 12 FOWLER FARM RD SCARBOROUGH, ME 4074	MAINE CREDIT UNION LEAGUE  DESCRIPTION: PRESIDENT	1	\$100.00
10/13/2013	MARKOS MILLER 17 ATLANTIC ST PORTLAND, ME 4101	PORTLAND PUBLIC SCHOOLS  DESCRIPTION: Teacher/Education	1	\$75.00
10/14/2013	DAVID GLASER 477 CONGRESS ST PORTLAND, ME 4101	FIRST MAINE INVESTMENT PROPERTIES  DESCRIPTION: PRESIDENT	1	\$25.00
10/14/2013	NESTLE WATERS NORTH AMERICA INC POLITICAL ACTION COMMITTEE 777 WEST PUTNAM AVENUE GREENWICH, CT 6836		5	\$2,500.00
10/15/2013	BAYVIEW DENTAL ASSOCIATES 70 BAYVIEW ST YARMOUTH, ME 4096		3	\$200.00
10/15/2013	MARK BESSIRE 314 DANFORTH ST PORTLAND, ME 4102	PORTLAND MUSEUM OF ART  DESCRIPTION: EXECUTIVE DIRECTOR	1	\$150.00
10/15/2013	JENNIFER EATON 52 NEAL STREET PORTLAND, ME 4102	REQUESTED  DESCRIPTION: REQUESTED	1	\$175.00
10/15/2013	MICHAEL GLENNON 50 LORING DRIVE NORWELL, MA 2061	PMI LLC  DESCRIPTION: MEDICAL DEVICE EXECUTIVE	1	\$1,500.00
10/15/2013	ROBERT HOWE 593 GARDINER RD DRESDEN, ME 4342	HOWE MANAGEMENT COMPANY  DESCRIPTION: BUSINESS OWNER	1	\$100.00
10/15/2013	GUY MCCHESENEY 74 MELBOURNE ST PORTLAND, ME 4101	MAINE BODY WORKS  DESCRIPTION: OWNER	1	\$40.00
10/15/2013	JONATHAN SHENKIN 1 BALSAM LANE FREEPORT, ME 4032	AUGUSTA PEDIATRIC DENTISTRY  DESCRIPTION: DENTIST	1	\$1,000.00
10/17/2013	DIANE COTA 15 FARM GATE RD FALMOUTH, ME 4105	VERMONT AEROSPACE MFG  DESCRIPTION: SPECIAL PROJECTS COORDINATOR	1	\$500.00
10/17/2013	NANCY GRANT 82 MACKWORTH ST PORTLAND, ME 4103	BICYCLE ASSOCIATION OF MAINE  DESCRIPTION: EXECUTIVE DIRECTOR	1	\$100.00
10/18/2013	JULIE MELTON 29 BEACH RD PEAKS ISLAND, ME 4108	RETIRED  DESCRIPTION: Retired	1	\$50.00

10/19/2013	MAINE BEVERAGE ASSOCIATION 77 WATER STREET HALLOWELL, ME 4347		3	\$500.00
10/20/2013	KURT ADAMS 83 BOXWOOD DR YARMOUTH, ME 4096	FIRST WIND DESCRIPTION: SENIOR VICE PRESIDENT	1	\$1,000.00
10/21/2013	RACHAEL ALFOND 134 SHERIDAN STREET PORTLAND, ME 4101	SELF DESCRIPTION: SELF	1	\$1,500.00
10/21/2013	JOSHUA BRODER 96 ST. LAWRENCE ST. #2 PORTLAND, ME 4101	TILSON DESCRIPTION: BUSINESS OWNER	1	\$50.00
10/21/2013	MAINE CREDIT UNION LEAGUE LEGISLATIVE ACTION COMMITTEE PO BOX 1236 PORTLAND, ME 4104		5	\$500.00
10/21/2013	EDDIE WOODIN 280 GANNETT DR SOUTH PORTLAND, ME 4106	SELF DESCRIPTION: SELF	1	\$100.00
10/22/2013	JAMES BANKS 21 CHELSEY AVE PORTLAND, ME 4103	RETIRED DESCRIPTION: Retired	1	\$100.00
10/22/2013	EDWIN CHESTER PO BOX 3744 PORTLAND, ME 4104	CHESTER & VESTAL DESCRIPTION: Attorney/Legal	1	\$250.00
10/22/2013	HARBORVIEW PROPERTIES INC 47 INDIA ST SUITE B PORTLAND, ME 4101		3	\$1,500.00
10/23/2013	CHARLES JOHNSON 15 TALLWOOD RD AUGUSTA, ME 4330	KENNEBEC TECHNOLOGIES DESCRIPTION: OWNER	1	\$500.00
10/23/2013	HAROLD PACHIOS 882 SHORE RD CAPE ELIZABETH, ME 4107	PRETI FLAHERTY DESCRIPTION: PARTNER	1	\$100.00
10/23/2013	SPECTRUM MEDICAL GROUP 324 GANNETT DR SUITE 200 SOUTH PORTLAND, ME 4106		3	\$500.00
10/25/2013	WILLIAM ALFOND 14 OTIS PLACE BOSTON, MA 2108	RETIRED DESCRIPTION: Retired	1	\$400.00
10/25/2013	CHARLES MILLER 45 BELMONT ST PORTLAND, ME 4101	BERNSTEIN SHUR DESCRIPTION: Attorney/Legal	1	\$100.00
10/25/2013	VERIZON REQUESTED FOLSOM, CA 95763		3	\$250.00
10/26/2013	GARY AKOVENKO 14 MONUMENT ST PORTLAND, ME 4101	SELF DESCRIPTION: SELF	1	\$25.00

10/26/2013	WILLIAM DOBROWOLSKI 132 PARTRIDGE CIRCLE PORTLAND, ME 4102	SELF DESCRIPTION: SELF	1	\$100.00
10/28/2013	DAVID PEARL 64 EBEN HILL RD YARMOUTH, ME 4096	SELF DESCRIPTION: SELF	1	\$100.00
10/29/2013	TODD ALEXANDER 3 CARROLL ST PORTLAND, ME 4102	EAGLE POINT DESCRIPTION: BUSINESS	1	\$100.00
10/29/2013	GOVERNMENT STRATEGIES PO BOX 29 PORTLAND, ME 4112		3	\$100.00
10/30/2013	BARRY COOPER 197 PINE ST APT 35 PORTLAND, ME 4102	RETIRED DESCRIPTION: Retired	1	\$100.00
10/30/2013	STEPHEN GAAL 176 EASTERN PROMENADE PORTLAND, ME 4101	RETIRED DESCRIPTION: Not Currently Employed	1	\$500.00
10/31/2013	ADAM ARENS 769 PORTLAND RD SACO, ME 4072	PATRIOT SUBARU DESCRIPTION: OWNER	1	\$500.00
11/1/2013	ASTRA ZENECA PO BOX 15437 WILMINGTON, DE 19850		3	\$1,000.00
11/1/2013	LYNN DUBE 178 S MONMOUTH RD MONMOUTH, ME 4259	REQUESTED DESCRIPTION: REQUESTED	1	\$100.00
11/1/2013	KEVIN MAHANEY 30 ONSIDE DR GREENWICH, CT 6830	OLYMPIA COMPANIES DESCRIPTION: DEVELOPMENT	1	\$5,000.00
11/1/2013	STEPHANIE VOLO PO BOX 808 KENNEBUNK, ME 4046	PLANET DOG DESCRIPTION: CO-OWNER	1	\$250.00
11/3/2013	LYNDEL WISHCAMPER 35 LITTLE RIVER LANE FREEPORT, ME 4032	THE WISHCAMPER COMPANIES INC DESCRIPTION: BUSINESS	1	\$500.00
11/4/2013	JAMES COHEN 62 DEEPWOOD DR PORTLAND, ME 4102	VERRILL DANA DESCRIPTION: Attorney/Legal	1	\$100.00
11/4/2013	BERNARD GIVERTZ 70 CARROLL ST PORTLAND, ME 4102	RETIRED DESCRIPTION: Retired	1	\$25.00
11/5/2013	KARIN ANDERSON 21 CHESTNUT STREET #502 PORTLAND, ME 4101	SELF DESCRIPTION: Consultant	1	\$50.00
11/5/2013	PETER BASS 795 CONGRESS ST PORTLAND, ME 4101	SELF DESCRIPTION: Real Estate Professional	1	\$100.00

11/5/2013	GLENN CUMMINGS 24 NEVENS ST PORTLAND, ME 4103	MAINE ACADEMY OF NATURAL SCIENCES  DESCRIPTION: PRESIDENT	1	\$200.00
11/5/2013	MERI LOWRY 60 HIGHLAND ST PORTLAND, ME 4102	UNUM  DESCRIPTION: SENIOR COUNSEL	1	\$150.00
11/6/2013	DAVID FAULKNER 171 BRADLEY ST PORTLAND, ME 4102	DAY ONE  DESCRIPTION: EXECUTIVE DIRECTOR	1	\$250.00
11/6/2013	JOE PERRY AND SONS LLC 162 GARLAND ST BANGOR, ME 4401		3	\$100.00
11/6/2013	MAINE FRANCHISE OWNERS PAC 415 CONGRESS ST PORTLAND, ME 4101		5	\$500.00
11/6/2013	SHARON ROSEN 8 MATTHEWS ST PORTLAND, ME 4103	SELF  DESCRIPTION: Consultant	1	\$250.00
11/7/2013	AT&T REQUESTED BOSTON, MA 2111		3	\$500.00
11/7/2013	ROGER BERLE 6 ISLAND AVE CLIFF ISLAND, ME 4019	N/A  DESCRIPTION: WRITER	1	\$1,000.00
11/7/2013	JONATHAN CRASNICK 12 EVERGREEN FARMS RD SCARBOROUGH, ME 4074	MONKS O'NEIL DEVELOPMENT  DESCRIPTION: DIRECTOR ASSET MANAGEMENT	1	\$50.00
11/7/2013	DOUGLAS GREEN 12 BIRCH KNOLLS CAPE ELIZABETH, ME 4107	GREEN DESIGN FURNITURE CO.  DESCRIPTION: DESIGNER/OWNER	1	\$500.00
11/7/2013	CHARLENE KINNELLY 15 PIERCE ST GARDINER, ME 4345	REQUESTED  DESCRIPTION: REQUESTED	1	\$50.00
11/7/2013	R STRAWBRIDGE REQUESTED WILMINGTON, DE 19807	REQUESTED  DESCRIPTION: REQUESTED	1	\$1,000.00
11/8/2013	DANIEL DOIRON 20 CUSHNOC LN BRUNSWICK, ME 4011	ALBIN RANDALL & BENNETT  DESCRIPTION: ACCOUNTANT	1	\$200.00
11/8/2013	EMILIE EEGHEN 60 DICKEY RD CANAAN, ME 4924	REQUESTED  DESCRIPTION: REQUESTED	1	\$25.00
11/10/2013	JACQUELINE POTTER 66 STROUDWATER RD PORTLAND, ME 4102	SELF  DESCRIPTION: SELF	1	\$500.00

11/11/2013	PETER EGLINTON 189 FRANCES ST PORTLAND, ME 4102	PORTLAND PUBLIC SCHOOLS  DESCRIPTION: Teacher/Education	1	\$75.00
11/11/2013	STEPHEN JENKS 123 NEAL STREET PORTLAND, ME 4102	SELF-EMPLOYED  DESCRIPTION: Consultant	1	\$200.00
11/11/2013	DANIEL TREMBLE 20 MONTGOMERY ST BANGOR, ME 4401	SELF  DESCRIPTION: Consultant	1	\$250.00
11/12/2013	PAMELA PLUMB 104 PARK ST PORTLAND, ME 4101	PAMELA PLUMB & ASSOCIATES  DESCRIPTION: Consultant	1	\$100.00
11/14/2013	ELI LILLY COMPANY POLITICAL ACTION COMMITTEE REQUESTED INDIANAPOLIS, IN 48285		5	\$500.00
11/15/2013	EUGENE STORY 82 BOWDOIN ST PORTLAND, ME 4102	SELF  DESCRIPTION: SELF	1	\$500.00
11/19/2013	PETER CALLNAN PO BOX 10892 PORTLAND, ME 4104	HONECK O'TOOLE  DESCRIPTION: CPA	1	\$150.00
11/19/2013	BENJAMIN DUDLEY 9 PONCE STREET PORTLAND, ME 4101	SELF  DESCRIPTION: GOVERNMENT AFFAIRS	1	\$50.00
11/20/2013	GENERAL MOTORS COMPANY PAC 25 MASSACHUSETTS AVE NW SUITE 400 WASHINGTON, DC 20001		5	\$500.00
11/22/2013	CHRISTOPHER CAMPBELL 536 CONGRESS ST PORTLAND, ME 4101	SELF  DESCRIPTION: ARCHITECT	1	\$125.00
11/22/2013	SUMMIT NATURAL GAS OF MAINE INC. 7810 SHAFFER PARKWAY SUITE 120 LITTLETON, CO 80127		3	\$250.00
11/23/2013	KATELL WILDENBERG 151 PINE ST APT. 1 PORTLAND, ME 4102	N/A  DESCRIPTION: N/A	1	\$150.00
12/1/2013	KRISTEN STEVENS 273 BRACKETT ST PORTLAND, ME 4102	LITERACY VOLUNTEERS OF MAINE  DESCRIPTION: Teacher/Education	1	\$1,000.00
12/4/2013	DONALD TUSKI 580 OCEAN STREET SOUTH PORTLAND, ME 4106	MAINE COLLEGE OF ART  DESCRIPTION: PRESIDENT	1	\$100.00
12/5/2013	PAUL NAU 78 COLUMBIA AVE BRUNSWICK, ME 4011	WOODFORDS FAMILY SERVICES  DESCRIPTION: ADMINISTRATOR	1	\$100.00

12/9/2013	MARTIN ROGOFF 27 COYLE STREET PORTLAND, ME 4101	UNIV. OF MAINE SCHOOL OF LAW  DESCRIPTION: PROFESSOR OF LAW	1	\$100.00
12/13/2013	CHURCHILL DOWNS 700 CENTRAL AVE LOUISVILLE, KY 40208		3	\$1,500.00
12/17/2013	RICHARD SPENCER 62 BOWDOIN ST PORTLAND, ME 4102	DRUMMOND WOODSUM  DESCRIPTION: Attorney/Legal	1	\$250.00
12/23/2013	GEORGE SMITH 130 NEAL ST PORTLAND, ME 4102	IDSVA  DESCRIPTION: Teacher/Education	1	\$125.00
12/23/2013	JOHN WENTZELL 468 CUMBERLAND AVE PORTLAND, ME 4101	APPALACHIAN MOUNTAIN CLUB  DESCRIPTION: MAINE POLICY DIRECTOR	1	\$50.00
12/30/2013	JOSEPH BOULES 18 MENIKOE PT FALMOUTH, ME 4105	CBRE/BOULOS ASSET MANAGEMENT  DESCRIPTION: Real Estate Professional	1	\$500.00
12/31/2013	UNIVERSAL AMERICAN 4888 LOOP CENTRAL DRIVE SUITE 700 HOUSTON, TX 77081		3	\$500.00
<b>TOTAL CASH CONTRIBUTIONS</b>				<b>\$38,790.00</b>

**SCHEDULE B-1  
OPERATING EXPENDITURES**

EXPENDITURES TYPES				
CNS	Campaign consultants	POL	Polling and survey research	
CON	Contribution to other candidate, party, committee	POS	Postage for U.S. Mail and mail box fees	
EQP	Equipment (office machines, furniture, cell phones, etc.)	PRO	Other professional services	
FND	Fundraising events	PRT	Print media ads only (newspapers, magazines, etc.)	
FOD	Food for campaign events, volunteers	RAD	Radio ads, production costs	
LIT	Print and graphics (flyers, signs, palmcards, t-shirts, etc.)	SAL	Campaign workers' salaries and personnel costs	
MHS	Mail house (all services purchased)	TRV	Travel (fuel, mileage, lodging, etc.)	
OFF	Office rent, utilities, phone and internet services, supplies	TVN	TV or cable ads, production costs	
OTH	Other	WEB	Website design, registration, hosting, maintenance, etc.	
PHO	Phone banks, automated telephone calls			

DATE OF EXPENDITURE	PAYEE	REMARK	TYPE	AMOUNT
10/6/2013	ACTBLUE 14 ARROW ST #11 CAMBRIDGE, MA 02183	CREDIT CARD FEES	OTH	\$15.80
10/20/2013	ACTBLUE 14 ARROW ST #11 CAMBRIDGE, MA 02183	CREDIT CARD FEES	OTH	\$59.25
10/27/2013	ACTBLUE 14 ARROW ST #11 CAMBRIDGE, MA 02183	CREDIT CARD FEES	OTH	\$1.98
11/3/2013	ACTBLUE 14 ARROW ST #11 CAMBRIDGE, MA 02183	CREDIT CARD FEES	OTH	\$59.25
11/11/2013	ACTBLUE 14 ARROW ST #11 CAMBRIDGE, MA 02183	CREDIT CARD FEES	OTH	\$30.63
11/24/2013	ACTBLUE 14 ARROW ST #11 CAMBRIDGE, MA 02183	CREDIT CARD FEES	OTH	\$7.91
12/8/2013	ACTBLUE 14 ARROW ST #11 CAMBRIDGE, MA 02183	CREDIT CARD FEES	OTH	\$3.95
12/15/2013	ACTBLUE 14 ARROW ST #11 CAMBRIDGE, MA 02183	CREDIT CARD FEES	OTH	\$3.95
TOTAL OPERATING EXPENDITURES				\$182.72



STATE OF MAINE  
COMMISSION ON GOVERNMENTAL ETHICS  
AND ELECTION PRACTICES  
135 STATE HOUSE STATION  
AUGUSTA, MAINE  
04333-0135

July 21, 2014

Sen. Justin Alfond  
Alfond Business, Community & Democracy PAC  
143 Vaughn Street  
Portland, ME 04102

Re: Late Filing of 2013 October Quarterly Report

Dear Sen. Alfond:

The Commission staff has made a preliminary determination that the Alfond Business, Community & Democracy PAC (the PAC) was late in filing its 2013 October Quarterly campaign finance report. The Commission staff considers the report late as a result of substantial non-conformity with disclosure requirements. Under the Commission's statutes, the late filing of a report triggers an enforcement process. (21-A M.R.S.A. § 1062-A(3)). Based on the amount of financial activity in the report, the number of calendar days the report was late, and the PAC's history of violations, the commission staff has determined that a penalty of \$21,764.42 is owed. (Please see attached penalty matrix for the calculation).

The PAC may make a written request that the Commission waive the violation or penalty in whole or in part. Any request for a waiver must be made within 14 calendar days of your receipt of this notice. The request must be in writing and contain a full explanation of the reasons the PAC filed late. Upon receiving your request, the Commission staff will schedule your appeal for an upcoming Commission meeting.

The Commission may waive the penalty if it determines that the report was late due to mitigating circumstances, which are defined as (1) a valid emergency; (2) an error made by the Commission staff; or (3) relevant evidence that the PAC made a bona fide effort to file the report on time. Also, the Commission may waive the penalty if it is disproportionate to the level of experience of the person filing the report or the harm suffered by the public from the late disclosure.

Please call me at (207) 287-4179 or send me an email at [benjamin.p.dyer@maine.gov](mailto:benjamin.p.dyer@maine.gov) if you have questions.

Sincerely,

A handwritten signature in cursive script that reads "Benjamin P. Dyer".

Benjamin P. Dyer  
Political Committee and Lobbyist Registrar



Payment Receipt

Mail payment to:

The Maine Ethics Commission  
135 State House Station  
Augusta, ME 04333.

Make checks payable to: "Treasurer, State of Maine."

Sen. Justin Alford  
Alford Business, Community & Democracy PAC  
143 Vaughn Street  
Portland, ME 04102

<b>Violation:</b>	Late 2013 October Quarterly Report
<b>Amount Due:</b>	\$21,764.42

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**Committee Name:** Alford Business, Community & Democracy PAC

**Report Title:** 2013 October Quarterly  
**Due Date:** October 7, 2013

**Previous Violation(s):** N/A

**Filed Date:** July 18, 2014

The penalty for late filing of a required report is a percentage of the total contributions or expenditures for the filing period, whichever is greater, multiplied by the number of calendar days the report is filed late, as follows:

For the first violation, 1%

For the second violation, 3%

For the third and each subsequent violation, 5%

**A penalty begins to accrue at 11:59 p.m. on the day the report is due.**

<b>Penalty Example:</b>		<b>Your Penalty is calculated as follows:</b>	
The treasurer files the PAC's report two (2) days late. The PAC has not had any previous late violations this biennium. The PAC reports a total of \$2,500 in contributions and \$1,600 in expenditures for the filing period. The penalty is		-	
\$2,500	Greater amount of the total contributions received or expenditures made during the filing period	Contributions / Expenditures:	<u>\$108,822.11</u>
		X	
		Percent Prescribed:	<u>1%</u>
X .01	Percent prescribed for first violation		<u>\$1088.22</u>
		X	
\$25.00	One percent of total contributions	Number of days late:	<u>283</u>
X 2	Number of calendar days late		
		Total penalty accrued:	<u>\$307,966.26</u>
		Statutory Maximum:	<u>\$21,764.42</u>
\$50.00	Total Penalty		

**Any penalty of less than \$10 is waived.**

Violations accumulate on reports with filing deadlines in a 2-year period that begins on January 1st of each even-numbered year. Waiver of a penalty does not nullify the finding of a violation.

**A required report that is sent by certified or registered United States mail and postmarked at least 2 days before the deadline is not subject to penalty.**

#### MAXIMUM PENALTIES

21-A M.R.S.A. Section 1062-A(3)

\$10,000 for Pre- and Post-Election Reports, Quarterly Reports and 24-Hour Reports, except that if the financial activity reported late exceeds \$50,000, the maximum penalty is one-fifth of the amount reported late.



STATE OF MAINE  
COMMISSION ON GOVERNMENTAL ETHICS  
AND ELECTION PRACTICES  
135 STATE HOUSE STATION  
AUGUSTA, MAINE  
04333-0135

July 21, 2014

Sen. Justin Alfond  
Alfond Business, Community & Democracy PAC  
143 Vaughn Street  
Portland, ME 04102

Re: Late Filing of 2014 January Quarterly Report

Dear Sen. Alfond:

The Commission staff has made a preliminary determination that the Alfond Business, Community & Democracy PAC (the PAC) was late in filing its 2014 January Quarterly campaign finance report. The Commission staff considers the report late as a result of substantial non-conformity with disclosure requirements. Under the Commission's statutes, the late filing of a report triggers an enforcement process. (21-A M.R.S.A. § 1062-A(3)). Based on the amount of financial activity in the report, the number of calendar days the report was late, and the PACs history of violations, the commission staff has determined that a penalty of \$10,000.00 is owed. (Please see attached penalty matrix for the calculation).

The PAC may make a written request that the Commission waive the violation or penalty in whole or in part. Any request for a waiver must be made within 14 calendar days of your receipt of this notice. The request must be in writing and contain a full explanation of the reasons the PAC filed late. Upon receiving your request, the Commission staff will schedule your appeal for an upcoming Commission meeting.

The Commission may waive the penalty if it determines that the report was late due to mitigating circumstances, which are defined as (1) a valid emergency; (2) an error made by the Commission staff; or (3) relevant evidence that the PAC made a bona fide effort to file the report on time. Also, the Commission may waive the penalty if it is disproportionate to the level of experience of the person filing the report or the harm suffered by the public from the late disclosure.

Please call me at (207) 287-4179 or send me an email at [benjamin.p.dyer@maine.gov](mailto:benjamin.p.dyer@maine.gov) if you have questions.

Sincerely,

Benjamin P. Dyer  
Political Committee and Lobbyist Registrar

Payment Receipt

Mail payment to:

The Maine Ethics Commission  
135 State House Station  
Augusta, ME 04333.

Make checks payable to: "Treasurer, State of Maine."

Sen. Justin Alford  
Alford Business, Community & Democracy PAC  
143 Vaughn Street  
Portland, ME 04102

**Violation:** Late 2014 January Quarterly Report  
**Amount Due:** \$10,000.00

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**Committee Name:** Alford Business, Community & Democracy  
PAC

**Report Title:** 2014 January Quarterly

**Due Date:** January 15, 2014

**Previous Violation(s):** 10/8/2013

**Filed Date:** July 18, 2014

The penalty for late filing of a required report is a percentage of the total contributions or expenditures for the filing period, whichever is greater, multiplied by the number of calendar days the report is filed late, as follows:

For the first violation, 1%

For the second violation, 3%

For the third and each subsequent violation, 5%

**A penalty begins to accrue at 11:59 p.m. on the day the report is due.**

<b>Penalty Example:</b>		<b>Your Penalty is calculated as follows:</b>	
The treasurer files the PAC's report two (2) days late. The PAC has not had any previous late violations this biennium. The PAC reports a total of \$2,500 in contributions and \$1,500 in expenditures for the filing period. The penalty is			
\$2,500	Greater amount of the total contributions received or expenditures made during the filing period	Contributions / Expenditures:	<u>\$39,239.00</u>
		X	
		Percent Prescribed:	<u>3%</u>
X .01	Percent prescribed for first violation		<u>\$1177.17</u>
		X	
\$25.00	One percent of total contributions	Number of days late:	<u>184</u>
X 2	Number of calendar days late		
		Total penalty accrued:	<u>\$216,599.28</u>
		Statutory Maximum:	<u>\$10,000.00</u>
\$50.00	Total Penalty		

**Any penalty of less than \$10 is waived.**

Violations accumulate on reports with filing deadlines in a 2-year period that begins on January 1st of each even-numbered year. Waiver of a penalty does not nullify the finding of a violation.

**A required report that is sent by certified or registered United States mail and postmarked at least 2 days before the deadline is not subject to penalty.**

#### **MAXIMUM PENALTIES**

21-A M.R.S.A. Section 1062-A(3)

\$10,000 for Pre- and Post-Election Reports, Quarterly Reports and 24-Hour Reports, except that if the financial activity reported late exceeds \$50,000, the maximum penalty is one-fifth of the amount reported late.